

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL MOI, an individual,
Plaintiff,

v.

CHIHULY STUDIO, INC., a Washington
corporation; DALE CHIHULY,
individually and as a married person;
LESLIE CHIHULY, individually and as a
married person,

Defendants.

No. 2:17-cv-00853-RSL

RESPONSE TO DECLARATION OF
ANNE M. BREMNER

CHIHULY INC., a Washington
corporation; and DALE CHIHULY,
individually,

Counterclaim-
Plaintiffs,

v.

MICHAEL MOI, an individual,

Counterclaim-
Defendant

1 While Chihuly disagrees with certain statements and characterizations in the two
2 recently-filed declarations (Dkt. ## 192 & 193), those declarations only confirm that the relief
3 requested by Chihuly's motion (Dkt. # 186) is both non-burdensome and appropriate in the
4 circumstances. Again, if the Court has any interest in assessing the probative value of the
5 documents with respect to the promissory estoppel issue, Chihuly can make the documents
6 available for review in camera.

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9 DATED: August 29, 2019

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Dale Chihuly and Leslie Chihuly, and
Counterclaim- Plaintiffs Chihuly, Inc. and
Dale Chihuly

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CERTIFICATE OF SERVICE

I certify that on the date mentioned below, I caused the foregoing to be served on the following attorney(s) of record by the method(s) indicated:

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I certify under penalty of perjury that the foregoing is true and correct.

DATED this 29th day of August, 2019.

s/ William C. Rava
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